

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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CARLOS ALBERTO LOPEZ, MARGARITA
ALVAREZ, LETICIA MATA LAZARO, and
MARIEL BADILLO HOYOS, *individually and
on behalf of others similarly situated,*

Index No. 1:24-cv-02092- PKC-TAM

Plaintiffs,

DECLARATION OF ROBERT JUN

- against -

JENNIE'S KITCHEN LLC (D/B/A JENNIE'S
KITCHEN), JENNIFER DENISE PINEDA, and
ERIK PINEDA,

Defendants.

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Robert Jun, an attorney duly admitted to practice in New York and in this Court declares under penalty of perjury pursuant to 28 USC Section 1746 as follows;

1. I am an attorney at Michael Faillace & Associates, P.C., attorneys for all Plaintiffs in this matter.
2. I submit this affirmation in support of this office's motion to withdraw from representation of Plaintiff Carlos Alberto Lopez ("Lopez") pursuant to Local Civil Rule 1.4.
3. The reason for the motion is the undersigned attempted to call Mr. Lopez to obtain information relating to Defendants' discovery demands. However, on July 7, 2025, the undersigned had a telephone conversation with Mr. Lopez' cousin, whereby she informed us that Mr. Lopez was apprehended by Immigration and Customs Enforcement on or about in May 2025, and that he is currently being detained in a prison in Mexico.
4. Given the circumstances, this office will not be able to continue representing Mr. Lopez, as there is no way for us to communicate with him.
5. Accordingly, we respectfully request that this Court grant leave for Michael Faillace & Associates, P.C. to withdraw as Plaintiff Carlos Albert Lopez' attorneys.
6. We do not intend to assert a retaining lien or charging lien.

Dated: New York, New York
July 7, 2025

/s/ Robert Jun

Robert Jun
Michael Faillace & Associates, P.C.
One Grand Central Place
60 East 42nd Street, Suite 4510
New York, NY 10165
(tel) 212-317-1200
(fax) 212-317-1620